

CHAPTER 5—CONSULTATION AND COORDINATION

5.1 INTRODUCTION

This chapter describes the consultation and coordination that occurred prior to and during preparation of this Moab Master Leasing Plan and Proposed Resource Management Plan Amendments (Proposed Plan)/Final Environmental Impact Statement (MLP/FEIS). The consultation process began with the publication of the Notice of Intent (NOI) on March 5, 2012, to prepare the Moab Master Leasing Plan and Draft Resource Management Plan Amendments/Draft Environmental Impact Statement (MLP/DEIS), as required under the National Environmental Policy Act (NEPA). The Bureau of Land Management (BLM) decision making process is conducted in accordance with the requirements of NEPA, the regulations of the Council on Environmental Quality (CEQ), and the policies and procedures used by the Department of Interior (DOI) and BLM to implement NEPA. NEPA and its associated regulatory and policy framework require the following: 1) that all Federal agencies involve interested groups of the public, as well as State and local governments, other Federal agencies, and Federally-recognized Native American tribes, in their decision making process; 2) that a reasonable range of alternatives is developed; and 3) that all potential impacts of proposed actions and alternatives are disclosed.

The MLP/FEIS was prepared by an interdisciplinary team of specialists from the BLM Canyon Country District Office and Booz Allen Hamilton, the contractor hired to assist in the preparation of the MLP/FEIS. The BLM and cooperating Federal, State, and County agencies provided technical review and support.

This environmental document was prepared in consultation and coordination with various Federal, State, and local agencies, organizations, and individuals. Agency consultation and public participation have been accomplished through a variety of formal and informal methods, including public meetings, workshops, correspondence (both traditional and electronic), and meetings with various public agencies and interest groups. This chapter summarizes these activities.

5.2 CONSULTATION AND COORDINATION

Federal laws require the BLM to consult with Native American Tribes, the State Historic Preservation Office (SHPO), the U.S. Fish and Wildlife Service (USFWS), and the Environmental Protection Agency (EPA) during the planning/NEPA decision making process. This section documents the specific consultation and coordination efforts undertaken by the BLM throughout the entire process of developing the MLP/FEIS.

5.2.1 Native American Tribes

The BLM is mandated to consult with Native American tribes concerning the identification of their cultural values, religious beliefs, and traditional practices that may be affected by actions on Federal lands. Laws and executive orders requiring consultation include the following:

- National Environmental Policy Act of 1969, as amended (NEPA)
- National Historic Preservation Act of 1966, as amended (NHPA)
- American Indian Religious Freedom Act of 1978 (AIRFA)
- Native American Graves Protection and Repatriation Act of 1990, as amended (NAGPRA)
- Federal Land Management and Policy Act of 1976 (FLMPA)
- Archaeological Resources Protection Act of 1979 (ARPA)
- Executive Order 11593 - Protection and Enhancement of the Cultural Environment

- Executive Order 12898 - Environmental Justice
- Executive Order 13007 - Indian Sacred Sites
- Executive Order 13175 - Consultation and Coordination with Indian Tribal Governments

Additionally, the BLM has developed guidelines for consultation with Native American tribes. BLM Manuals 8120 (*Tribal Consultation Under Cultural Resources*, BLM 2004) and H-8120-1 (*General Procedural Guidance for Native American Consultation*, BLM 2004) provide consultation requirements and procedural guidance to ensure that the consultation record demonstrates “that the responsible manager has made a reasonable and good faith effort to obtain and consider appropriate Native American input in decision making” (H-8120-1, BLM 2004). Recommended procedures for initiating the consultation process include project notification, preferably by certified mail, follow-up contact (e.g., telephone calls), and meetings when appropriate (H-8120-1, BLM 2004).

Native American organizations were invited to participate at all levels of the planning process for the MLP. Early and continued consultation with Native American tribes throughout the planning process is an integral part of developing comprehensive planning documents which seek input from all affected and interested individuals, groups and organizations. Table 5-1 contains a list of Native American tribes consulted for this planning effort.

Table 5-1. Native American Tribes Contacted for Consultation

Tribal Organization	
Hopi Indian Tribe	Navajo Nation
Pueblo of Acoma	Pueblo of Jemez
Pueblo of Laguna	Pueblo of Santa Clara
Pueblo of Zia	Pueblo of Zuni
Paiute Indian Tribe of Utah	Southern Ute Tribe
Uinta and Ouray Reservation	Ute Mountain Ute Tribe
White Mesa Ute Tribe	

On January 19, 2012, the BLM sent consultation letters to the tribes. To date, only the Hopi tribe has responded. The Hopi accepted the BLM’s invitation to become involved in the MLP process, and on April 18, 2012, a meeting between representatives of the Hopi Cultural Preservation Office and BLM staff was held at the Hopi Cultural Preservation Office in Kykotsmovi Village, Arizona to discuss the MLP process and any general issues and concerns.

Below is a summary of the Hopi tribe’s concerns that were raised during the April 18, 2012, meeting. Only comments concerning management actions in the MLP/DEIS are included below. Tribal concerns have been incorporated into the BLM’s land management decision making process.

The Hopi tribe raised the following issues and concerns:

- The Hopi Preservation Office supports the identification and avoidance of prehistoric archaeological findings of their ancestors as it considers them to be “footprints” and Traditional Cultural Properties (TCP).

- The Hopi Preservation Office recommends that the BLM not lease parcels with high densities of prehistoric sites, as the co-mingling of energy development and cultural resource protection has been demonstrated to result in indirect and direct adverse effects to cultural resources.
- The Hopi supported the conservation alternative in the previous resource management plan (RMP), rather than the one that was chosen, although they understood the intent of the preferred alternative was to implement a balanced management option. The Hopi thought the balanced alternative favored energy development and did not contain needed protections for cultural resources.
- The Hopi consider the Greater Chaco Landscape MLP to be a good model and one that they would like the BLM Canyon Country District Office to use as a guide. They sent a copy on January 30, 2012, in their response to the BLM's initial consultation letter.
- The Hopi expressed concern that the BLM's mixed-use model would not provide sufficient protection for the viewsheds of the National Parks.
- The Hopi do not want to provide concurrence on "no impact to cultural properties" for seismic operations because they ultimately lead to development and the Hopi aren't necessarily allowed to change their previous consultation decisions.
- The Hopi expressed concern with the issuance of categorical exclusions for oil and gas development, which they believed was segmenting larger projects.
- The Hopi had concerns with the eagle surveys, the Hopi "take" permits, and their own need for eagle feathers. The Hopi think BLM activities affect the eagle prey base, (e.g. prairie dogs and jack rabbits), and they requested that the BLM consider the prey base in approving and permitting activities on their land. The Hopi are concerned with energy development and the related impact on the prey base for eagles and want eagle habitat protected.

On June 4, 2014, the BLM sent a letter to the Hopi informing them about the preliminary alternatives for the MLP/DEIS. The Hopi responded on June 23, 2014 in which they acknowledged the preliminary alternatives and did not have any comments.

The BLM notified the Native American tribes listed in Table 5-1 about the availability of the MLP/DEIS for public review and comment on September 22, 2015. The Hopi responded on October 7, 2015 stating that they recommend the BLM not lease parcels with high densities of prehistoric sites. They also indicated that they supported Alternative C because it provides more protection for cultural sites.

5.2.2 State Historic Preservation Office

Section 106 of the NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties and consult the SHPO and consulting parties on such undertakings. The BLM has involved consulting parties in the findings and determinations made during the Section 106 process for the Moab MLP. The consulting parties include the SHPO along with individuals and organizations with a demonstrated interest in the project. The BLM has conducted three meetings with the SHPO and consulting parties concerning Section 106.

The SHPO was notified about the availability of the MLP/DEIS for review and comment. The BLM has initiated SHPO consultation on the Proposed Plan in the MLP/FEIS and will complete SHPO consultation before the Record of Decision is signed.

5.2.3 U.S. Fish and Wildlife Service

The BLM must consult with the USFWS in accordance with Section 7 of the Endangered Species Act and the Fish and Wildlife Coordination Act prior to initiation of a project that may affect Federally-listed species.

The Moab MLP is considered a major Federal project and the BLM will initiate consultation with the USFWS by submitting a Biological Assessment (BA) when the Proposed Plan for the Final EIS is determined. The USFWS may concur with the BLM's determination in the BA via memorandum, or prepare a Biological Opinion which advises the BLM on the actions that must be taken to protect Federally-listed species. The BLM will finalize Section 7 consultation before the Record of Decision is signed.

5.2.4 Environmental Protection Agency

The BLM initiated coordination with the EPA early in the planning process. They were contacted about being a cooperating agency but they chose to participate on an informal basis especially with regard to air and water quality. EPA was provided copies of planning related documents for review and comment. In addition, a copy of the MLP/DEIS was provided to EPA for its review and comment. Based on comments received from the EPA, additional analyses and information regarding air and water quality has been included in the MLP/FEIS.

5.2.5 Cooperating Agency Involvement

A cooperating agency is an eligible governmental entity that has entered into a written agreement with the BLM to establish cooperating agency status in the planning process. The BLM and the cooperating agency work together under the terms of the agreement. Cooperating agencies participate in the various steps of the BLM's planning process as feasible, given the constraints of their resources and expertise (43 CFR 1601.0-5 (e)). The BLM collaborates with cooperating agencies in identifying issues, collecting inventory data, formulating alternatives, estimating effects of the alternatives, and developing a preferred alternative. The following government entities accepted the BLM's invitation to become cooperating agencies in the planning process for the Moab MLP:

- Grand County
- San Juan County
- State of Utah
- National Park Service (NPS)

A cooperating agency coordination meeting/training session was conducted on May 3, 2012. The meeting was attended by representatives from the State of Utah, Grand County, San Juan County, and NPS. The purpose of the meeting was to provide an opportunity to enhance coordination and share new information, inform the cooperating agencies about the MLP process, explain cooperating agency involvement in the process, and present a schedule of milestones and events. Meetings with the cooperating agencies and the BLM interdisciplinary team were held on February 5 and 6, 2014, in order to formulate the alternatives for the MLP/DEIS. On May 7, 2014, a meeting was held with the cooperating agencies to discuss the preliminary alternatives for the MLP/DEIS. A meeting was held with the cooperating agencies on January 8, 2015 to discuss the administrative draft of the MLP/DEIS and to provide them the opportunity for review and comment.

5.2.6 Consistency with Other Plans

The BLM's planning regulations (43 CFR 1610.3-2) require that RMPs and amendments be consistent with officially approved or adopted resource-related plans of other Federal agencies, State and local

governments, and Indian tribes, so long as the guidance and resource management plans are also consistent with the purposes, policies, and programs of Federal law and regulations applicable to public lands.

Public law 43 U.S.C. §1712(c) (9) states that the Secretary of the Interior (through the land-use plans of the Federal agencies under it) shall “coordinate the land-use inventory, planning, and management activities of or for such lands with the land-use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located.” It further states that “the Secretary shall assure that consideration is given to those State, local, and tribal plans that are germane in the development of land-use plans for public lands and assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal government plans...” This language does not require the BLM to adhere to or adopt the plans of other agencies or jurisdictional entities, but rather to give consideration to these plans and make an effort to resolve inconsistencies to the extent practical.

The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP and amendments for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolved to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). Where State and local plans conflict with Federal law, it would result in an inconsistency that cannot be resolved or reconciled. Thus, while County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations. The BLM will identify these conflicts in the Proposed Plan, so that the State and local governments have a complete understanding of the impacts of the Proposed Plan on State and local management options. A consistency review of the Proposed Plan with the State and County Master Plans is included in Chapter 5. In addition, the relevant goals, objectives, or policies of a County are often equivalent to an activity or implementation level decision and not a land-use plan decision. The very specific County goals would be addressed in any subsequent BLM activity or implementation level decision.

Table 5-2 outlines the planning consistency of the Proposed Plan with the approved management plans, land-use plans, and controls of other agencies with jurisdiction in or adjacent to the Planning Area. With a few exceptions, the Proposed Plan is consistent with the Grand and San Juan County Plans. The authorized officer will continue to collaborate with Federal agencies, state and local governments, and Indian tribes on implementation of the MLP and on pursuing consistency with other plans and will move toward integration of such plans to the extent that they are consistent with Federal laws, regulations, and policy directives.

Table 5-2. Plan Consistency Review

Proposed Plan				
Category	Grand County General Plan Update (2012)	Consistent	Partially Consistent	Not Consistent
Goal 1, Strategy E	Maintain and enhance the recreational, scenic, and cultural amenities unique to Grand County to attract and sustain economic activity.	X		
Goal 1, Strategy G	Encourage businesses to develop solid and fluid mineral resources while using the best technology and mitigation techniques to protect natural amenities and natural resources.	X		
Goal 5, Strategy A	Encourage oil, gas, and mining companies to use the best technology and mitigation techniques to protect natural amenities and natural resources.	X		
Economic Use of Public Lands, Public Lands Policy 1	Encourage the expeditious processing of permits for the economic use of public lands that benefit the local economy and are consistent with the policies of this plan, especially permits for the film industry, mineral extraction, and recreation. <u>BLM Response:</u> This policy is equivalent to an implementation level decision (permit to drill) and does not correlate to a land use plan decision. The BLM encourages the expeditious processing of drilling permits.	X		
Land Restoration, Public Lands Policy 7	Encourages public land-management agencies to restore damaged areas.	X		
Dark Night Skies, Public Lands Policy 16	Consult with public land-management agencies to ensure dark skies are not compromised on public lands.	X		
Natural Quiet, Public Lands Policy 17	Encourage public lands agencies to implement measures to ensure natural quiet is not degraded.	X		
Scenic Byways Corridor Management (2008): Section 6.1, Scenic Resources	The scenic resources along Utah State Scenic Byways 128, 279, and 313 are recognized as internationally significant.	X		

Scenic Byways Corridor Management (2008): Section 6.3, Recreation Resources	Recreation resources along and adjacent to State Scenic Byways 128, 279, and 313 are recognized as internationally significant and a destination unto themselves for recreational visitors. They also support many types of recreational activities.	X		
Grand County Trails Master Plan (2011)	The plan strives to make trails an integral part of the community by preserving access to public lands and accommodating a variety of users.			
Category	San Juan County Master Plan Update (2008)	Consistent	Partially Consistent	Not Consistent
Existing and Desired Conditions/Policies/Goals, Objectives and Monitoring				
Multiple Use	<p>San Juan County is aware that “multiple use” means different things to different people. The county feels that federal agencies recognize “multiple use” as a mandate, but view it as a management problem. In practice, the county sees land management agencies increasingly managing a greater number of acres for “single use” and not attempting to mitigate resource conflicts on these acres. Agency regulations seem to conflict with the county’s desires and/or definition of multiple use.</p> <p><u>BLM Response:</u> As required by FLPMA and BLM policy, certain public lands, where appropriate, may be managed in a manner that will preserve and protect their natural condition.</p>		X	
Clarification of San Juan County’s Ongoing Plan for Managing Certain Lands in the Public Lands Region of the County. Achieve and Maintain A Continuing Yield of Mineral Resources at the Highest Reasonably Sustainable Levels				
Section 3	San Juan County recognizes that it is technically feasible to access mineral and energy resources while preserving non-mineral and non-energy resources.	X		
Section 3	<p>All available solid, fluid, and gaseous mineral resources should be seriously considered for development.</p> <p><u>BLM Response:</u> The BLM seriously considered the development of all solid, fluid, and gaseous mineral resources in the planning process.</p>	X		

Section 3	<p>Lands shown to have reasonable mineral potential should be open to oil and gas leasing with stipulations and conditions that will protect the lands against unreasonable and irreparable damage to other significant resource values. This should include reasonable and effective mitigation and reclamation measures and bonding for such where necessary.</p> <p><u>BLM Response:</u> The Proposed Plan provides lands open to oil and gas leasing with stipulations except where precluded by conflicts with other important resource values.</p>		X	
Section 3	<p>Any previous lease restrictions that are no longer necessary or effective should be modified, waived, or removed.</p> <p><u>BLM Response:</u> Nearly all stipulations include criteria for exceptions, modifications, and waivers.</p>	X		
Section 3	<p>Restrictions against surface occupancy should be modified, waived, or if necessary removed where it is shown that directional drilling is not ecologically necessary, where directional drilling is not feasible from an economic or engineering standpoint, or where it is shown that directional drilling will in effect sterilize the mineral and energy resources beneath the area.</p> <p><u>BLM Response:</u> For the Proposed Plan, it is recognized that not all the mineral and energy resources in the areas identified with a no surface occupancy stipulation would be recovered.</p>		X	
Section 3	<p>Applications for permission to drill that meet standard qualifications, including reasonable and effective mitigation and reclamation requirements, should be expeditiously processed and granted.</p> <p><u>BLM Response:</u> This applies to an implementation decision and not a planning decision and therefore is not applicable.</p>			

State of Utah				
Category	Deadhorse Point State Park Resource Management Plan (2007)	Consistent	Partially Consistent	Not Consistent
Resource Management	The Plan recognizes that the Park was established because of the superb panoramic views available from Dead Horse Point. The viewshed is the Park's most important resource, but is almost entirely outside of the Park's boundary and management control. Some activities on the lands surrounding Dead Horse Point could adversely affect the view from the Park.	X		
Water Resources	Utah Division of Water Resources Southeast Colorado River Basin of the Utah State Water Plan (May 2001)	X		
Wildlife and Fisheries	Utah Division of Wildlife Resources Conservation Agreement and Strategy for Colorado River Cutthroat Trout (March 1997)	X		
Wildlife and Fisheries	Conservation and Management Plan For Three Fish Species in Utah Addressing Needs for Roundtail Chub, Bluehead Sucker, and Flannelmouth Sucker (2006)	X		
Wildlife and Fisheries	Utah Division of Wildlife Resources Statewide Management Plan for Mule Deer (2014)	X		
Wildlife and Fisheries	Utah Division of Wildlife Resources Statewide Management Plan for Elk (2015)	X		
Wildlife and Fisheries	Utah Division of Wildlife Resources Statewide Management Plan for Bighorn Sheep (2013)	X		
Consistency with State of Utah Code 63J-8-105.2. San Juan County Energy Zone				
State of Utah <p>The San Juan County Energy Zone in San Juan County is established for the purpose of maximizing efficient and responsible development of energy and mineral resources. The land encompasses the Hatch Point area and a large part of the Harts Point area.</p> <p>The State finds that the lands comprising the Energy Zone contain abundant world-class deposits of energy and mineral resources, including oil, natural gas, and potash; and the highest management priority is the responsible management,</p>		BLM <p>A small portion of the San Juan County Energy Zone lies within the Planning Area. This portion of the Energy Zone includes the Hatch Point area, Harts Point area, and the southern portion of the Behind the Rocks area.</p> <p>The Hatch Point area contains the highly scenic Canyon Rims Special Recreation Management Area (SRMA) which includes two campgrounds, four developed overlooks, and constructed and maintained hiking trails. The overlooks along the rims of Hatch Point</p>		

development, and extraction of existing energy and mineral resources in order to provide long-term domestic energy and supplies for the State and the United States.

The State supports efficient and responsible full development of all existing energy and mineral resources located within the San Juan County Energy Zone, including oil, natural gas, potash, uranium, vanadium, limestone, copper, sand, gravel, wind, and solar; and a cooperative management approach by Federal agencies, the State, and local governments to achieve broadly supported management plans for the full development of all energy and mineral resources within the San Juan County Energy Zone.

The State requests that the federal agencies that administer lands within the San Juan County Energy Zone fully cooperate and coordinate with the state and with San Juan County to develop, amend, and implement land and resource management plans and to implement management decisions that are consistent with the purposes, goals, and policies described in this section to the maximum extent allowed under Federal law; expedite the processing, granting, and streamlining of mineral and energy leases and applications to drill, extract, and otherwise develop all existing energy and mineral resources located within the San Juan County Energy Zone, including oil, natural gas, potash, uranium, vanadium, copper, sand, gravel, wind, and solar resources; allow continued maintenance and increased development of roads, power lines, pipeline infrastructure, and other utilities necessary to achieve the goals, purposes, and policies described in this section; refrain from any planning decisions and management actions that will undermine, restrict, or diminish the goals, purposes, and policies for the San Juan County Energy Zone as stated in this section; and refrain from implementing a policy that is contrary to the goals and purposes within this section.

The State calls upon Congress to establish an intergovernmental standing commission, with membership consisting of representatives from the United States government, the State, and local governments, to guide and control planning and management actions in the San Juan County Energy Zone in order to achieve and maintain the goals, purposes, and policies described in this section.

Notwithstanding the provisions of this section, the State's grazing and livestock policies and plans on land within the San Juan County Energy Zone shall continue to be governed by Sections 63J-4-401 and 63J-8-104.

provide world class views of Lockhart Basin and Canyonlands National Park. The SRMA is accessed by two State of Utah Designated Scenic Backways (Needles Overlook and Anticline Roads). The SRMA attracts visitors from across the world. A NSO stipulation is applied to the Visual Resource Management (VRM) Class II area from the Scenic Backways west to the rims of the Hatch Point escarpment. This area encompasses the majority of the scenic attractions and developed recreation sites. The remainder of the area is managed with minor constraints (CSU and TL stipulations) for mineral development.

The Harts Point area contains a small portion of a State of Utah Designated Scenic Byway (Highway 211) which is managed with a NSO stipulation. The remainder of the area is managed with minor constraints (CSU and TL stipulations) for mineral development.

The southern portion of the Behind the Rocks area contains highly scenic landscapes that are managed as VRM Class II, two high use recreation areas, and a portion of an ACEC. These resources are managed with a NSO stipulation. The remainder of the area is managed with minor constraints (CSU and TL stipulations) for mineral development.

In total, 48 percent of the Energy Zone within the Planning Area would be managed with NSO stipulations and 52 percent would be managed with minor constraints. These NSO stipulations contain an exception which would allow proposed mineral operations provided they would not result in long term visual impairment from key observation points.

Directional and horizontal drilling must be utilized within areas with a NSO stipulation in order to recover the mineral resources. Access to these NSO areas for directional and horizontal drilling is provided by existing leases and State and private lands. In addition, the exception could provide additional access to these resources.

The Proposed Plan provides for mineral development within the San Juan County Energy Zone while protecting high quality visual resources and heavily utilized recreation opportunities. Therefore, the Proposed Plan is consistent to the extent practical with State of Utah Code 63J-8-105.2.

5.3 PUBLIC OUTREACH AND PARTICIPATION

Public participation is integral to ensuring that planning issues important to public land users are addressed. Public participation in the BLM planning process includes a variety of efforts to identify and address public concerns and needs. Public involvement assists the agencies in the following:

- Broadening the information base for decision making.
- Informing the public about the Moab MLP and the potential impacts associated with various management decisions.
- Ensuring that public needs and viewpoints are understood by the BLM.
- Satisfying the public participation requirements of FLPMA (43 U.S.C. 1712), the FLPMA implementing regulations (43 CFR 1610.2), NEPA (42 U.S.C. 4371), the CEQ regulations (40 CFR 1501.7), and the implementing regulations for Section 106 of NHPA at 36 CFR 800.

5.3.1 Public Scoping

On March 5, 2012, the BLM Canyon Country District Office initiated a planning process with the publication of the NOI in the Federal Register. The NOI announced the Canyon Country District Office's intent to prepare a MLP, potential amendments to the Moab and Monticello RMPs, and an associated EIS. The NOI also initiated the scoping period, which ended on May 7, 2012. The purpose of scoping, as required by NEPA, is to involve the public in the planning process and use the comments received to identify the issues to be addressed in the MLP/DEIS (40 CFR 1501.7). These issues assist the BLM in the development of alternatives and analysis that will be evaluated in the EIS. Scoping also provides the public an opportunity to learn about the management of public lands and helps the BLM to identify the public's concerns regarding resources within the Planning Area.

Three public scoping meetings were held over a one-week period in March and April, 2012. The meetings were conducted in an open-house format for two hours. Several informational posters and maps regarding specific resource uses and issues were displayed at the meetings. These posters and maps served as a starting point for attendees to discuss planning issues with BLM resource specialists and also helped participants to provide feedback and comments on specific policies and issues. Additionally, BLM resource specialists from a number of resource area disciplines were available to answer questions and provide additional information on these and other specific issues throughout the meeting. The locations, dates, and attendance of the public scoping meetings are shown in Table 5-3.

Table 5-3. Locations, Dates, and Attendance of Public Scoping Meetings

Meeting Location	Meeting Date	Registered Attendance
Monticello, UT	March 27, 2012	8
Moab, UT	March 28, 2012	66
Salt Lake City, UT	April 3, 2012	26
Total		100

Throughout the scoping period, 181 individuals, agencies, and groups provided comments concerning the future management of the Planning Area. Analysis of these comments resulted in the identification of 372

unique, substantive comments. The analysis of comments is included in the Scoping Report for the Moab MLP (October, 2012).

On May 14, 2014, the BLM Canyon Country District Office sponsored a three hour open house meeting to allow interested members of the public to review the preliminary range of alternatives for the Moab MLP/DEIS. Maps of the preliminary alternatives were available for viewing and BLM resource specialists and managers were present to answer questions. In addition, a PowerPoint presentation was projected which outlined the MLP process and information about submitting comments. The meeting was announced in the *Moab Times Independent* and the *Moab Sun News* and was attended by 92 individuals. The maps of the alternatives were also posted on the Moab MLP website on the date of the meeting, which also kicked off a two-week public comment period. The BLM received 305 comments from individuals, organizations, and agencies concerning the preliminary alternatives, out of which 22 substantive comments were identified and considered in finalizing the alternatives for the MLP/DEIS. Comments included a proposed alternative, identification of mapping errors, incorporating the recently acquired lands from the Utah State Institutional Trust and Lands Administration, and using comprehensive socioeconomic information. The comments were used to finalize the alternatives in the MLP/DEIS.

5.3.2 Mailing List

The mailing list for public scoping was initially developed by the Canyon Country District Office and has been revised throughout the planning process. The mailing list included over 1,000 individuals, organizations, and government agencies that may have interest in the MLP process. Individuals were encouraged to add themselves to the project mailing list by contacting the BLM. The mailing list was used during the distribution of a newsletter and postcards during the planning process.

5.3.3 Newsletter, Postcards, and Press Releases

A project newsletter was developed to keep the public informed of the planning process for the MLP/DEIS. The March, 2012 newsletter provided basic background information regarding the project, including the purpose and need for developing the Moab MLP and issues the project may address. The newsletter also notified the public about the public scoping meetings to be held in Monticello, Moab, and Salt Lake City on March 27, March 28, and April 3, respectively. A postcard was mailed on January 17, 2014, which updated the public about the Moab MLP process and with information posted on the Moab MLP website. A postcard was also mailed on August 20, 2015 announcing the availability of the MLP/DEIS, the public comment period, and information on upcoming public meetings. In addition, press releases were distributed to news outlets regarding the scoping period, preliminary alternatives, and the availability of the MLP/DEIS.

5.3.4 Project Website

Information on the MLP/FEIS can also be found at the project website (<http://www.blm.gov/ut/st/en/fo/moab/MLP.html>). The purpose of the website is to provide the public with further opportunity to learn about the Planning Area, related resource issues, the project purpose and need, and the planning process. The website also provides the public with access to all pertinent documents associated with the planning process.

5.3.5 Socioeconomic Workshops

Two socioeconomic workshops were conducted by the BLM in Grand County on June 27, 2012, and in San Juan County on June 28, 2012. The purpose of these workshops was to discuss the County economic baseline data used in the preparation of the MLP/DEIS and MLP/FEIS. The workshops were attended by County elected officials and staff, as well as some members of the public. The information gained in the

workshops was used to inform the Socioeconomic Baseline Report which provided supporting information for the MLP/FEIS.

5.3.6 Public Release of the MLP/DEIS

On August 21, 2015, the BLM and EPA published a Notice of Availability (NOA) for the MLP/DEIS in the *Federal Register* (80 FR 50867) which initiated a formal public comment period (94 days) which ended on November 23, 2015. The MLP/DEIS was distributed to appropriate Federal agencies with jurisdiction by law or special expertise and to State and local agencies, including Indian Tribes. Copies of the MLP/DEIS were also made available to the public at public libraries, the MLP website, and BLM offices.

Public Meetings

The public was provided with an opportunity to review and comment on the MLP/DEIS during the 94-day public comment period. Three public meetings were held during the comment period to inform the public about the MLP/DEIS. The locations, dates, and attendance of the public meetings for the MLP/DEIS are shown on Table 5-4.

Table 5-4. Locations, Dates, and Attendance of Public Meetings

Meeting Location	Meeting Date	Registered Attendance
Moab, UT	September 23, 2015	56
Monticello, UT	September 24, 2015	6
Salt Lake City, UT	October 6, 2015	24
Total		86

The meetings were conducted in an open-house format for about a two to three hour period. Several informational posters and maps regarding specific resource uses and issues were displayed at the meetings. In addition, large maps of the alternatives in the MLP/DEIS were available for viewing along with a PowerPoint presentation which outlined the MLP process and information about submitting comments. After public review of this information, BLM managers and resource specialists with a variety of disciplines were available to answer questions and provide additional information throughout the meetings.

Public Comments on the MLP/DEIS

Appendix G includes public comments and BLM responses on the MLP/DEIS. The BLM published the NOA for the MLP/DEIS for public review and comment in the *Federal Register* on August 21, 2015. This notice initiated the 94-day public comment period which concluded on November 23, 2015.

A total of 28,277 letters were received: 28,208 were sent by e-mail and 69 were submitted in hard copy or sent by mail. Comments received at public meetings were considered hardcopy comments. Of the 28,208 email comments received, 28,068 were identified as form letters. Form letters are described as letters containing identical text submitted by more than five individuals.

According to NEPA, the BLM is required to identify and formally respond to all substantive public comments. On the basis of the CEQ regulations, a substantive comment does one or more of the following:

- Questions, with a reasonable basis, the accuracy of the information in the environmental impact statement.

- Questions, with a reasonable basis, the adequacy of environmental analysis as presented.
- Presents reasonable alternatives other than those presented in the MLP/DEIS that meet the purpose and need of the proposed action and addresses significant issues.
- Causes changes or revisions in the proposal.

Non-substantive comments simply state a position in favor of, or against, an alternative; merely agree or disagree with BLM policy; or otherwise express an unsupported personal preference or opinion.

BLM is required to respond only to substantive comments to fully inform the public of concerns raised. In Appendix G the BLM has provided responses to all substantive public concerns identified during comment analysis. Responses to substantive comments are more extensive, complete, and often offer an explanation of why a comment may or may not have resulted in a change to the Proposed Plan in the MLP/FEIS.

The BLM read all public response letters in their entirety and identified comments that related to a particular concern or resource consideration or that proposed management actions. Every effort was made to keep each comment within a letter as a standalone comment. The BLM looked not only for each action or change requested by the public, but also for any supporting information to capture the comment in its entirety. In doing so, paragraphs within a comment letter may have been divided into several comments because of multiple comments being presented or, alternatively, sections of a letter may have been combined to form one coherent statement.

Once a comment was identified, the BLM assigned it to a category associated with the overall premise of the comment. A coding structure served as a tool to sort comments into logical groups by topics. In this case, the coding structure was organized to mirror the sections of the MLP/DEIS; some additional categories were added that included additional classification of comments.

A database was used to organize and compile the large number of comments received on the MLP/DEIS. Comments that were received electronically through the internet were automatically entered in the database. The coding of these letters was also done from the database. Comments identified in hard copy letters were entered verbatim into the project database. The content analysis process also involved identifying all form letters. The initial course of action in this step was conducted using the database to filter all web-based and e-mail comments to identify all letters containing identical text. Once a form letter was identified, it was given an identification number, copied, and coded. If a hard copy letter matched a form letter, it was given the same identification number. If a form letter included any original comments, the comments were treated as a unique comment, coded, and entered into the database.

During the process of identifying concerns, all comments were treated equally. The comments were not weighted by organizational affiliation or status of respondents, and the number of duplicate comments did not add more bias to one comment than another. The process was not one of counting votes and no effort was made to tabulate the exact number of people for, or against, any given aspect of the MLP/DEIS. Rather, emphasis was placed on the content of a comment.

The BLM received multiple comment letters on the MLP/DEIS that shared similar issues and content. For these comments, more general responses, called general comment responses (GCRs), were written to address the similar issues and content represented. In the case of identical or similar comments, the comments were summarized to represent the full range of an issue. These comments and associated responses can be identified where more than one comment number is in the Comment ID cell. In the case of unique comments, each response is preceded by the submitted comment.

As previously stated, the comments are organized according to the outline of the MLP/DEIS and in no way indicate the significance of any statement. The BLM's response to the public concern follows each comment.

5.4 LIST OF PREPARERS

As required by NEPA regulations (40 CFR §1502.17), Table 5-5 lists the people primarily responsible for preparing the MLP/FEIS, and presents their qualifications. Booz Allen Hamilton, a contractor selected to prepare the MLP/FEIS, as directed by the BLM, has, in accordance with 40 CFR §1506.5(c), certified that it does not have any financial or other interest in the outcome of decisions to be made pursuant to the MLP/FEIS. In addition to the specific responsibilities listed, many BLM staff members contributed substantial time consulting with other agency personnel in preparing the MLP/FEIS.

Table 5-5. List of Preparers

Name	Education	Project Role
Bureau of Land Management		
Ann Marie Aubry	B.S., Geology, Northern Arizona University	Soil, Water, Riparian Resources, Floodplains (Moab)
Jed Carling	B.S., Rangeland Resources, Utah State University	Floodplains, Wetlands/Riparian Resources, Invasive Species/Noxious Weeds, Vegetation (Monticello)
Rebecca Doolittle	B.S., Geology, Western Washington University	Mineral Resources (Moab)
Leonard Herr	B.S., Natural Resources, Humboldt State University	Air Resources
Don Montoya	B.S., Anthropology, Brigham Young University M.A., Anthropology, Brigham Young University Graduate Certificate, Museum Studies, Brigham Young University	Cultural Resources
Aron King	B.S., Anthropology, University of Oregon	Cultural Resources
M. Jared Lundell	B.A., Anthropology, University of Texas – Arlington M.A., Anthropology, Northern Arizona University	Cultural Resources
Eric Jones	B.S., Geological Engineering, South Dakota School of Mines and Technology	Mineral Resources
Ted McDougall	B.S., Geology, Utah State University	Mineral Resources (Monticello)
Marie McGann		Mineral Resources

Name	Education	Project Role
Laird Naylor	B.S., Biology, Botany, Southern Utah University M.S., Quaternary Studies (Archaeology, Quaternary Geology, Paleoecology), Northern Arizona University	Cultural Resources
Brent Northrup	B.S., Geology, University of Utah	Project Manager
Todd Parker	B.A., Environmental Education, Prescott College	Areas of Critical Environmental Concern (ACEC), Wild and Scenic Rivers, Recreation, Visual Resources, Wilderness, Wilderness Characteristics (Monticello)
Brian Quigley	B.S., Recreation Management, Utah State University	Monticello Oversight
Pam Riddle	B.S., Biology, Colorado Mesa University B.S., Environmental Science, Colorado Mesa University	Wildlife, Migratory Birds, Threatened and Endangered Species, Utah BLM Sensitive Species (Moab)
Amanda Scott	B.S., Wildlife Biology, University of Wyoming M.S., Rangeland Management, University of Wyoming	Wildlife, Migratory Birds, Threatened and Endangered Species, Utah BLM Sensitive Species (Monticello)
Katie Stevens	B.A., History, Loyola University Chicago, M.A., English Education, Northeastern Illinois University Ph.D., Educational Psychology, University of Illinois at Urbana-Champaign	Quality Assurance/Quality Control, ACECs, Recreation, Wild and Scenic Rivers, Visual Resources
Bill Stevens	B.A., History, Loyola University Chicago M.A., History, University of Toronto M.B.A., Accounting, University of Chicago Ph.D., Accountancy, University of Illinois at Urbana-Champaign	Socioeconomics, Wilderness, Areas with Wilderness Characteristics, Environmental Justice
Doug Wight	B.S., Forestry, Utah State University M.S., Forestry, Utah State University	Geographic Information Systems (GIS)
Booz Allen Hamilton		
Jared Gunnerson	B.A., Political Science M.P.A., Natural Resource and Environmental Management	Resource Specialist—Cultural Resources, Paleontology, Lands and Realty

Name	Education	Project Role
Bryan Klyse	B.A., Social Science (Environment) M.E.S.M., Environmental Science and Management	Technical Reviewer
Pamela Middleton	B.A., Biology (Botany Emphasis), Minor in Environmental Studies and Planning M.A.S., Environmental Policy and Management	Project Manager Resource Specialist—Wildlife and Fisheries, Special Status Species, Vegetation, Riparian Resources, Livestock Grazing
Richard Pinkham	B.A., Geography, Dartmouth College M.S., Natural Resources Policy/Resource Economics, Cornell University	Resource Specialist—Socioeconomics
Tymeri Schleicher	B.S., Environmental Science, Creighton University M.S., Environmental Science, Indiana University M.P.A., Public Affairs (Natural Resources), Indiana University	Resource Specialist—Air Quality, Soil and Water
Mike Sumner	B.S., Recreation Resource Management, Utah State University	Resource Specialist—Lands with Wilderness Characteristics, Mineral Resources, Recreation, Special Designations, Visual and Soundscapes